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## **MEMO ENDORSED**

February 21, 2025

Via ECF

The Honorable Valerie E. Caproni United States District Court for the Southern District of New York 40 Foley Square, Room 240 New York, New York 10007 USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC #:\_\_\_\_\_\_ DATE FILED: 2/24/2025

Re: Matthew Tesla v. Drgut Pelinkovic a/k/a Doug Pelinkovic, et al. Case No.: 1:24-cv-08901-VEC

Dear Judge Caproni:

This firm represents Matthew Tesla ("Plaintiff"). We submit this letter pursuant to Section 2.C of the Court's Individual Practices in Civil Cases, to request an Extension of Time to file Plaintiff's opposition to defendant Doug Pelinkovic's ("Defendant") Motion to Dismiss Plaintiff's Amended Complaint (the "Motion to Dismiss") (Docket Entry #24). Specifically, Plaintiff requests that the deadline be extended by two weeks, making his opposition due on Thursday, March 13, 2025.

Plaintiff requests the extension because of the undersigned's trial schedule. The undersigned is scheduled to be on trial from February 24 through February 28 and March 10 through March 14. The undersigned is lead counsel in both the trial matter and this matter. Plaintiff's deadline to submit its Opposition to Defendant's Motion to Dismiss is Thursday, February 27, 2025. This is Plaintiff's first request for an extension of time in connection with the Motion to Dismiss. The Defendant has consented to this request on the condition that Defendant's Reply be due on March 27, 2025.

We thank the Court for its consideration to this matter.

Respectfully submitted,

/s Martin R. Kafafian Martin R. Kafafian

Cc: Counsel of Record (via ECF only)

Fifty-Five Years of Service

Application GRANTED. Plaintiff's Opposition is due **Thursday**, **March 13**, **2025**. Defendant's Reply is due **Thursday**, **March 27**, **2025**. The Court is unlikely to further adjourn these deadlines absent extraordinarily good cause.

SO ORDERED.

HON. VALERIE CAPRONI

UNITED STATES DISTRICT JUDGE